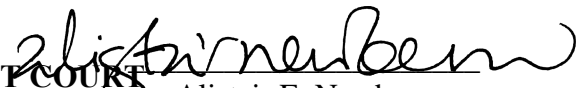


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION


Alistair E. Newbern
U.S. Magistrate Judge

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 3:23-cv-01092

Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Alistair Newbern

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c) and Local Rule 37.01, Plaintiffs Concord Music Group, Inc., Capitol CMG, Inc., Universal Music Corp., Songs of Universal, Inc., Universal Music – MGB NA LLC, Polygram Publishing, Inc., Universal Music – Z Tunes LLC, and ABKCO Music, Inc. (collectively, “Plaintiffs”) and Defendant Anthropic PBC (“Anthropic”), by and through their respective counsel, respectfully move for entry of the attached proposed Stipulated Protective Order. The parties have agreed to the language and content of the proposed Stipulated Protective Order and believe its entry is necessary for purposes of facilitating discovery while protecting certain information and documents that may be produced during the discovery process that the parties believe in good faith are sensitive, confidential, proprietary, and/or personal. However, Anthropic does not consent to jurisdiction or proper venue in the United States District Court for the Middle District of Tennessee by virtue of entering into this stipulated protective order with Plaintiffs and does not waive, and expressly reserves, its rights to have this case dismissed, or in the alternative transferred, per Anthropic’s pending motion to dismiss. *See* ECF No. 54. Plaintiffs and Defendant respectfully request that the Court enter the proposed Stipulated

Protective Order at its earliest convenience in light of pending discovery requests related to Plaintiffs' Motion for Preliminary Injunction. *See* ECF No. 40.

Dated: January 4, 2024

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CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

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